

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

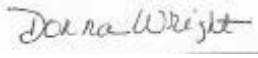
TYLER ALLEN CLICK, ET)
AL.,)
Plaintiffs,)
Case No. 2:18-CV-00455
VS.)
GENERAL MOTORS LLC,,)
Defendant.)

ORAL AND VIDEOTAPED DEPOSITION OF
HOMERO MEDINA
FEBRUARY 17, 2021
(REPORTED REMOTELY)

ORAL AND VIDEOTAPED DEPOSITION OF HOMERO MEDINA,
produced as a witness at the instance of the Defendant,
and duly sworn, was taken in the above-styled and
numbered cause on February, from 9:15 a.m. to
11:09 a.m., before Donna Wright, CSR No. 1971, in and
for the State of Texas, reported by machine shorthand
and remotely via Zoom, pursuant to the Federal Rules of
Civil Procedure, the 22nd Emergency Order Regarding the
COVID-19 State of Disaster, and any provisions stated
on the record or attached hereto.

<p style="text-align: right;">Page 34</p> <p>1 Q. Open Exhibit No. 2. Excuse me.</p> <p>2 A. Bless you.</p> <p>3 Q. Thank you.</p> <p>4 A. Okay.</p> <p>5 (Exhibit 2 marked)</p> <p>6 Q. (BY MS. ROSS) So the version we got of this,</p> <p>7 I can't read. And I -- my first question for you is do</p> <p>8 you recognize this document?</p> <p>9 A. Yes, that's the -- that's my third-party</p> <p>10 insurance, the United Vision insurance that's on the</p> <p>11 truck.</p> <p>12 Q. Okay.</p> <p>13 A. And I have -- I have actually -- I don't know</p> <p>14 if I have that one, but I do have the newer one, so...</p> <p>15 Q. Okay. I don't know that we need your -- this</p> <p>16 is just your liability insurance that covers your</p> <p>17 truck?</p> <p>18 A. Yeah. That's just one of the insurances that</p> <p>19 I have on the truck.</p> <p>20 Q. Okay. And you said you still have at least</p> <p>21 the current version of this?</p> <p>22 A. Oh, yes. The truck has always been covered,</p> <p>23 fully covered.</p> <p>24 Q. Okay. You can close that out and open</p> <p>25 Exhibit 3.</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Okay. Well, let me -- can't you guys do a</p> <p>2 CamScan and scan on CamScan and come out clearer?</p> <p>3 Q. I'm sorry. Can we what?</p> <p>4 A. CamScan? They have different filters and it</p> <p>5 should come out perfectly.</p> <p>6 Q. Well, I just asked if you could work with your</p> <p>7 attorney --</p> <p>8 A. Okay. Okay.</p> <p>9 Q. -- to find a way to get us a clearer copy --</p> <p>10 A. Sorry.</p> <p>11 Q. -- because we just can't read the document.</p> <p>12 I think I can read enough to see the</p> <p>13 signatures on the bottom of the first page. The</p> <p>14 signature on the left at the bottom of the first page</p> <p>15 of Exhibit 3, is that your signature?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. You can close that.</p> <p>18 A. Okay.</p> <p>19 Q. And then you can just leave it in the marked</p> <p>20 exhibit folder. We're going to come back to the other</p> <p>21 two in a minute.</p> <p>22 A. Okay.</p> <p>23 Q. Okay. So I think before we took our break we</p> <p>24 were talking about service and maintenance and repair</p> <p>25 to your -- to your vehicle. And you said that other</p>
<p style="text-align: right;">Page 35</p> <p>1 (Exhibit 3 marked)</p> <p>2 THE WITNESS: Okay.</p> <p>3 Q. (BY MS. ROSS) And this document has a little</p> <p>4 number at the bottom that says Medina 00002 through -3.</p> <p>5 I'm not sure why the exhibit sticker was so tiny.</p> <p>6 Perhaps the court reporter can fix that for us in the</p> <p>7 final version.</p> <p>8 But, again, this document seems to be a</p> <p>9 photograph of the document, and it's very hard for me</p> <p>10 to read. But do you know what this is?</p> <p>11 A. Yes, this is the contract I signed to buy the</p> <p>12 vehicle.</p> <p>13 Q. Okay. And can I ask that you -- do you still</p> <p>14 have this document?</p> <p>15 A. I honestly do not know.</p> <p>16 Q. Okay.</p> <p>17 A. Because I went through a lot of stuff. Like</p> <p>18 after I initially had conversations with the attorney</p> <p>19 that I talked to and I sent this stuff to, so I would</p> <p>20 actually have to go look for it. I'm not -- I'm not</p> <p>21 for sure.</p> <p>22 Q. Okay. Can I ask that you do look for it? And</p> <p>23 if you find the document, please provide it to your</p> <p>24 attorney so that they can scan it and send us a clearer</p> <p>25 copy?</p>	<p style="text-align: right;">Page 37</p> <p>1 than the fuel pump issue there were no other repairs</p> <p>2 needed to the truck and it has otherwise been perfect</p> <p>3 other than that?</p> <p>4 A. Yes.</p> <p>5 Q. Why don't you tell me about what happened with</p> <p>6 your fuel pump.</p> <p>7 A. From when it went out, basically?</p> <p>8 Q. When did you first have a problem with your</p> <p>9 truck?</p> <p>10 A. The first time I had a problem with my truck</p> <p>11 with the fuel pump was basically the last time I had a</p> <p>12 problem with my fuel pump. It went out all of a sudden</p> <p>13 with no warning. So it just -- basically my truck just</p> <p>14 turned off.</p> <p>15 Q. When was that?</p> <p>16 A. Excuse me?</p> <p>17 Q. When was that?</p> <p>18 A. Oh, my gosh. Like the exact date?</p> <p>19 Q. The best you can recall.</p> <p>20 A. I don't know. I can't think right now. But</p> <p>21 I -- I do know that it happened when my truck was at a</p> <p>22 hundred -- about 100,000 miles. So over -- over a year</p> <p>23 ago, I believe.</p> <p>24 Q. Was it in 2019?</p> <p>25 A. I can't recall, ma'am. All I know is that --</p>

<p style="text-align: right;">Page 66</p> <p>1 MS. RICKERT: Objection to form.</p> <p>2 THE WITNESS: No. To my knowledge, it's</p> <p>3 the people that bought the product and they are not</p> <p>4 happy with the product.</p> <p>5 Q. (BY MS. ROSS) Do you believe that everyone</p> <p>6 who's purchased a GM vehicle with a 6.6 Duramax diesel</p> <p>7 engine has had a fuel pump problem?</p> <p>8 A. I can't -- I really can't say, because I don't</p> <p>9 know. All I know is the people that I've seen and the</p> <p>10 people in my experience.</p> <p>11 Q. Who have you spoken with about this lawsuit?</p> <p>12 A. Nobody but the people on here and the initial</p> <p>13 person I talked to over the phone, and my</p> <p>14 ex-girlfriend.</p> <p>15 Q. And I believe I already asked you this, but</p> <p>16 just in case I didn't, do you know any of the other</p> <p>17 plaintiffs in this case?</p> <p>18 A. No, I do not.</p> <p>19 Q. You've never met them?</p> <p>20 A. No, ma'am.</p> <p>21 Q. You've never spoken with them?</p> <p>22 A. No, ma'am.</p> <p>23 Q. So unless Ms. Rickert has some questions for</p> <p>24 you, I think that that's all I have for you today. I</p> <p>25 would just say again on the record that I ask that you</p>	<p style="text-align: right;">Page 68</p> <p>1</p> <p>2</p> <p>3</p> <p>4 -- SIGNATURE REQUIRED --</p> <p>5</p> <p>6 * * * * *</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 67</p> <p>1 provide a copy of your purchase invoice for your</p> <p>2 vehicle to your attorney so that they can scan it and</p> <p>3 provide us with a legible copy.</p> <p>4 A. Okay.</p> <p>5 MS. RICKERT: Yes, we can do that. And I</p> <p>6 don't have any questions.</p> <p>7 MS. ROSS: That's all we have for you</p> <p>8 today, Mr. Medina. Thank you so much for your time,</p> <p>9 especially considering the weather emergency you all</p> <p>10 are experiencing. I hope you stay warm and safe.</p> <p>11 MR. MEDINA: Oh, no, all the shelves are</p> <p>12 empty over here so I'm staying at home.</p> <p>13 MS. RICKERT: Thank you, April.</p> <p>14 THE VIDEOGRAPHER: We are off the record</p> <p>15 at 11:09 a.m.</p> <p>16 MS. ROSS: Donna, do you need any</p> <p>17 information from us?</p> <p>18 THE VIDEOGRAPHER: Donna, I took us off</p> <p>19 the record at 11:09.</p> <p>20 MS. ROSS: Thank you.</p> <p>21 THE REPORTER: Bonnie, would you like the</p> <p>22 electronic copy?</p> <p>23 MS. RICKERT: We would like signature and</p> <p>24 the transcript.</p> <p>25 (Proceedings concluded at 11:09 a.m.)</p>	<p style="text-align: right;">Page 69</p> <p>1 UNITED STATES DISTRICT COURT</p> <p>2 SOUTHERN DISTRICT OF TEXAS</p> <p>3 CORPUS CHRISTI DIVISION</p> <p>4 TYLER ALLEN CLICK, ET AL.,)</p> <p>5 Plaintiffs,)</p> <p>6) Case No. 2:18-CV-00455</p> <p>7 VS.)</p> <p>8)</p> <p>9 GENERAL MOTORS LLC,,)</p> <p>10 Defendant.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>REPORTER'S CERTIFICATION OF THE ORAL DEPOSITION OF HOMERO MEDINA FEBRUARY 17, 2021 (REPORTED REMOTELY)</p> <p>I, Donna Wright, a Certified Shorthand Reporter and Notary Public in and for the State of Texas, hereby certify to the following:</p> <p>That the witness, HOMERO MEDINA, was remotely duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;</p> <p>That the original deposition was delivered to Ms. Bonnie Rickert.</p> <p>That a copy of this certificate was served on all parties and/or the witness shown herein on March 1, 2021.</p> <p>I further certify that pursuant to FRCP Rule 30(3) that the signature of the deponent: __X__ was requested by the deponent or a party</p>

<p style="text-align: right;">Page 70</p> <p>1 before the completion of the deposition and that the 2 signature is to be before any notary public and 3 returned within 30 days from date of receipt of the 4 transcript. If returned, the attached Changes and 5 Signature Page contains any changes and the reasons 6 therefore: 7 _____ was not requested by the deponent or a 8 party before the completion of the deposition. 9 I further certify that I am neither counsel 10 for, related to, nor employed by any of the parties or 11 attorneys in the action in which this proceeding was 12 taken, and further that I am not financially or 13 otherwise interested in the outcome of the action. 14 Certified to by me on this, the 1st day of 15 March, 2021. 16 17  18 _____ 19 Donna Wright, CSR No. 1971 20 Expiration Date: 12-31-2021 21 VERITEXT 22 515 Congress Avenue 23 Suite 1700 24 Austin, Texas 78701 25 Firm Registration No. 571</p>	<p style="text-align: right;">Page 72</p> <p>1 Click, Tyler Allen, Et Al. v. General Motors, LLC 2 Homero Medina (#4426031) 3 E R R A T A S H E E T 4 PAGE_____ LINE_____ CHANGE_____ 5 _____ 6 REASON_____ 7 PAGE_____ LINE_____ CHANGE_____ 8 _____ 9 REASON_____ 10 PAGE_____ LINE_____ CHANGE_____ 11 _____ 12 REASON_____ 13 PAGE_____ LINE_____ CHANGE_____ 14 _____ 15 REASON_____ 16 PAGE_____ LINE_____ CHANGE_____ 17 _____ 18 REASON_____ 19 PAGE_____ LINE_____ CHANGE_____ 20 _____ 21 REASON_____ 22 _____ 23 _____ 24 Homero Medina Date 25</p>
<p style="text-align: right;">Page 71</p> <p>1 Bonnie Rickert, Esquire 2 brickert@hmgllawfirm.com 3 March 1, 2021 4 RE: Click, Tyler Allen, Et Al. v. General Motors, LLC 5 2/17/2021, Homero Medina (#4426031) 6 The above-referenced transcript is available for 7 review. 8 Within the applicable timeframe, the witness should 9 read the testimony to verify its accuracy. If there are 10 any changes, the witness should note those with the 11 reason, on the attached Errata Sheet. 12 The witness should sign the Acknowledgment of 13 Deponent and Errata and return to the deposing attorney. 14 Copies should be sent to all counsel, and to Veritext at 15 cs-midatlantic@veritext.com 16 17 Return completed errata within 30 days from 18 receipt of testimony. 19 If the witness fails to do so within the time 20 allotted, the transcript may be used as if signed. 21 22 Yours, 23 Veritext Legal Solutions 24 25</p>	<p style="text-align: right;">Page 73</p> <p>1 Click, Tyler Allen, Et Al. v. General Motors, LLC 2 Homero Medina (#4426031) 3 ACKNOWLEDGEMENT OF DEPONENT 4 I, Homero Medina, do hereby declare that I 5 have read the foregoing transcript, I have made any 6 corrections, additions, or changes I deemed necessary as 7 noted above to be appended hereto, and that the same is 8 a true, correct and complete transcript of the testimony 9 given by me. 10 _____ 11 _____ 12 Homero Medina Date 13 *If notary is required 14 SUBSCRIBED AND SWORN TO BEFORE ME THIS 15 _____ DAY OF _____, 20____. 16 _____ 17 _____ 18 _____ 19 NOTARY PUBLIC 20 21 22 23 24 25</p>